

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-2(c)

DAY PITNEY LLP
One Jefferson Road
Parsippany, New Jersey 07054-2891
(973) 966-6300
Attorneys For Defendant
Travelers Property Casualty Company of America

In re:

MARINE ENVIRONMENTAL REMEDIATION
GROUP LLC, et al.

Debtors.

Marine Environmental Remediation Group LLC
and MER Group Puerto Rico LLC,

Plaintiffs,

vs.

Starr Indemnity & Liability Company and
Travelers Property Casualty Company of America,

Defendants.

Chapter 11

Case No. 19-18994-VFP
(Jointly Administered)

Judge: Vincent F. Papalia, U.S.B.J.

Adv. Pro. No. 20-1141-VFP

Hearing Date: July 7, 2020

**NOTICE OF MOTION OF TRAVELERS PROPERTY CASUALTY
COMPANY OF AMERICA TO DISMISS, OR, IN THE ALTERNATIVE,
TO STAY THIS ADVERSARY PROCEEDING**

PLEASE TAKE NOTICE that defendant Travelers Property Casualty Company of America (“Travelers”), by and through its undersigned counsel, will move before the Honorable Vincent F. Papalia on July 7, 2020, or as soon thereafter as counsel may be heard, at the United States Bankruptcy Court for the District of New Jersey, 50 Walnut Street, Courtroom 3B, Newark, New Jersey 07102, for entry of an Order dismissing the claims against Travelers in this adversary proceeding under the permissive abstention doctrine, or, in the alternative, staying the

claims against Travelers in this adversary proceeding pending resolution of the insurance coverage dispute between defendant Starr Indemnity & Liability Company and the Debtors Marine Environmental Remediation Group LLC and MER Group Puerto Rico LLC.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, Travelers shall rely on the accompanying Motion and the Certification of Stephen R. Catanzaro, Esq., which collectively set forth the factual and legal bases upon which the requested relief should be granted. Pursuant to D.N.J LBR 9013-1, a memorandum of law is unnecessary because the legal grounds for the requested relief are straightforward and well-settled.

PLEASE TAKE FURTHER NOTICE that on the aforementioned date, Travelers will request that the Court enter the proposed Order submitted herewith.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall be presented in accordance with the Federal Rules of Bankruptcy Procedure and the Local Rules of the United States Bankruptcy Court for the District of New Jersey.

PLEASE TAKE FURTHER NOTICE that unless objections are timely presented, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a).

PLEASE TAKE FURTHER NOTICE that the undersigned hereby requests oral argument if timely objection is filed.

Date: June 9, 2020

/s/ Stephen R. Catanzaro

Stephen R. Catanzaro, Esq.
Thomas D. Goldberg, Esq.
Joshua W. Cohen, Esq.
Day Pitney LLP
One Jefferson Road
Parsippany, NJ 07054
scatanzaro@daypitney.com
jwcohen@daypitney.com
(973) 966-6300

Rachel R. Hager, Esq.
Finazzo Cossolini O'Leary
Meola & Hager, LLC
67 East Park Place, Suite 901
Morristown, NJ 07960
rachel.hager@finazzolaw.com
(973) 343-4960

Christopher Abel, Esq.
Willcox & Savage, P.C.
440 Monticello Avenue, Suite 2200
Norfolk, VA 23510
cabel@wilsav.com
(757) 628-5547

Attorneys For Defendant
Travelers Property Casualty Company of
America